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Exclusion of fans embedded in commercial boilers

We appreciate the exclusion of fans embedded in regulated products when the energy consumption of the fan is accounted for in the test method of the appliance. Unfortunately, the current federally mandated test method for commercial boilers does not include electrical power consumption. While there is a new test method being developed that will include electrical power consumption, that is not a currently available option.

I encourage you to exclude fans embedded in commercial boilers from the proposed regulation for the following reasons:

- 1) The highest efficiency commercial boilers on the market all employ modulating combustion controls which help match output to heating load. Load matching reduces off cycle losses and improves operating efficiency. By regulating the fans and limiting the operating range, the range of modulation will be severely limited and boilers will become less efficient.
- 2) The electrical power consumption of commercial boilers is a small fraction of the energy consumed by commercial boilers. Any loss in combustion efficiency far outweighs gains to be made in electrical power consumption from fans.
- 3) Several large high efficiency commercial boilers use the largest fans available in the US and Europe. There are no options for larger capacity fans that can operate at a reduced capacity and still generate the air flow required for these boiler designs. Limiting the operating range of the fans will eliminate the largest high efficiency products currently available.

I appreciate the opportunity to submit these comments.